REMARKS

This response is to the Office Letter mailed in the above-referenced case on June 05, 2001. Claims 1-17 are presented for examination. Claims 1-17 are provisionally rejected under the judicially created doctrine of obviousness-type double patenting as being unpatentable over claims 1-16 of U.S. Patent No. 6,201,804 in view of Iwami. Claims 1-2, 5-8 and 11-15 are rejected under 35 U.S.C. 103(a) as being unpatentable over Williams et al., hereinafter Williams, in view of Iwami et al., hereinafter Iwami. Claims 3-4 and 9-10 are rejected under 35 U.S.C. 103(a) as being unpatentable over Williams in view of Iwami, and further in view of Ito et al., hereinafter Ito. Claims 16 and 17 are rejected under 35 U.S.C. 103(a) as being unpatentable over Williams.

Applicant has carefully studied the rejection, the Examiner's remarks, and the references provided by the Examiner. In response, applicant herein amends the claims to specifically recite that the data network is the Internet, and calls placed on the Internet are IPNT calls. Applicant herein provides a terminal disclaimers in order to overcome the obviousness-type double patenting rejection.

Regarding claim 1, an argument was presented in the last amendment provided by the applicant that Williams did not teach a system wherein two people engaged in live conversation and one is on the COST or PSTN network, and the other is on the Internet or DNT network. In response the Examiner provides the art of Iwami. Applicant herein amends the claims to specifically recite that the data network is the Internet and Calls placed on, or received from the Internet are Internet Protocol Network Telephony (IPNT) calls. Iwami's teaching is limited to the local area

network (LAN), usually being an Ethernet type connection. In applicant's invention calls can be made all over the world on the COST or Internet network, not restricted to a LAN as in Iwami. Iwami does not teach Internet Protocol telephony as disclosed and claimed in applicant's invention. Therefore, the art of Iwami cannot be relied upon to teach a live call between a COST network and the Internet as claimed in applicant's invention.

Regarding claim 1, the Examiner states that William's discloses a bridge unit comprising: a trunk-line port for receiving and placing COST calls (14, 15); a data network port for receiving and placing DNT calls ; conversion circuitry (15); control routines wherein a first call is dynamically converted and placed on the other network (col. 5, lines 15-25).

Applicant argues that applicant's disclosure teaches and claims a computerized telephony bridge unit. Williams teaches a system and method for placing a conventional telephone call through a RBOC (public telephony switch) to a server 15 in one geographical location, which converts the received telephone call into data packets. The packets are then sent to server 20, which is in a completely separate geographic location, which converts the packets back to analog telephony for forwarding to another telephone. Williams does not accomplish applicant's claimed invention with a single unit as claimed. Applicant's claim 1 specifically recites; "a data network port and associated circuitry for receiving and placing Internet Protocol Telephony Network (IPNT) calls on the Internet". Williams requires two separate servers in separate geographic locations to accomplish the conversion.

Williams clearly does not disclose a trunk-line port and associated circuitry for receiving and placing Connection Oriented/Switched Telephony (COST) telephone calls on a COST network, and a data network

port and associated circuitry for receiving and placing IPNT calls on a data network. Williams discloses that the servers 15 and 20 receive a call in one protocol and place a call in another; i.e. analog to DNT, or DNT to analog.

Applicant claims an apparatus and method enabling dynamic telephony calls to take place between participants (a caller and a recipient) wherein one of the participants of the call is on a data network and one of the participants of the call is on a COST network. In applicant's invention the caller and the destination are on two separate networks. Not so in the art of Williams. Williams teaches placing an analog voice call with a conventional telephone, converting the call to DNT, traveling the Internet to another server, converting the call back to analog voice and delivering the call to the destination telephone. William's system cannot read on the telephony system as claimed in applicant's invention.

Therefore, applicant believes claim 1, as amended, is patentable over the art of Williams and Iwami as argued above. Claims 3-6 are patentable on their own merits, or at least as depended from a patentable claim. Claims 2 is herein canceled.

Applicant herein amends claim 7 to include similar limitations as amended in claim 1. Claim 7 now recites The Internet and placing IPNT calls. Applicant believes claim 7, as amended, is patentable over the art of Williams and Iwami as argued above on behalf of claim 1. Claims 9-12 are patentable on their own merits, or at least as depended from a patentable claim. Claim 8 is herein canceled.

Independent claim 13 is also herein amended to positively recite that the data network is the Internet and calls on the Internet are Internet Protocol Network Telephony (IPNT) calls. Williams teaches a method for placing a COST call, transferring the call over a packet network, placing the call to another COST network. There is no live connection between two users on separate networks in the art of Williams as claimed in applicant's

invention. Iwami is limited to a LAN and does not teach or suggest IPNT as claimed. Applicant believes claim 13, as amended, is patentable over the art of Williams and Iwami. Claims 15-17 are patentable on their own merits, or at least as depended from a patentable claim. Claim 14 is herein canceled.

As all of the claims are patentable to the Applicant over the art of Williams and Iwami, the Applicant respectfully requests reconsideration and that the case be passed quickly to issue.

If there are any extensions of time required beyond any extension specifically petitioned and paid with this response, such extensions are hereby requested. If there are any fees due beyond any fees paid by check with this response, authorization is given to deduct such fees from deposit account 50-0534.

Version With Markings to Show Changes Made

In the claims:

1. (Amended) A computerized telephony bridge unit, comprising:

a trunk-line port and associated circuitry for receiving and placing Connection Oriented/Switched Telephony (COST) telephone calls on a COST network;

a data network port and associated circuitry for receiving and placing [Data Network Telephony (DNT)] Internet Protocol Telephony Network (IPNT) calls on [a data network] the Internet; and

conversion circuitry for converting data representing calls dynamically between [DNT] IPNT and COST telephone calls;

wherein control routines functioning as part of the bridge unit receive a first call from one of the COST and [DNT] Internet networks, place a call associated with the received call on the network other than the network on which the call is received, and dynamically convert data between the associated calls, and the dynamic conversion of data enables two people to engage in a live conversation even though one person is on [a data network] the Internet and the other is on a COST network.

3. (Amended) The bridge unit of claim 1 further comprising a digitally-stored look-up table relating COST telephone numbers to IP addresses, and

wherein the control routines are adapted to retrieve specific data from an incoming call, either COST or [DNT] IPNT, and to use the retrieved data to access the look-up table to determine an associated COST telephone number or IP address, and to use the associated COST telephone number or IP address to place a call associated with the incoming call.

5. (Amended) The bridge unit of claim 1 wherein the control routines receive [a DNT] an IPNT call from a caller, and negotiate with the caller to ascertain a COST telephone number to use to place a COST call associated with the incoming [DNT] IPNT call.

6. (Amended) The bridge unit of claim 5 wherein the bridge unit further comprises an Interactive Voice Response (IVR) unit, and wherein the IVR unit negotiates with the caller to ascertain a COST telephone number for a call to be associated with the incoming [DNT] IPNT call.

7. (Amended) A method for converting telephony calls between Connection Oriented/Switched Telephony (COST) calls and [Data Network Telephony (DNT)] Internet Protocol Telephony Network (IPNT) calls, comprising steps of:

(a) connecting a COST trunk line to a trunk-line port and associated circuitry for receiving and placing Dedicated Connection Telephony (COST) telephone calls on a COST network, the trunk line port and associated circuitry in a computerized telephony bridge unit;

(b) connecting [a data network] an Internet line to a data network port and associated circuitry for receiving and placing [Data Network

Telephony (DNT)] IPNT calls on [a data network] the Internet, the data network port and associated circuitry also in the computerized telephony bridge unit;

(c) receiving a first call from one of the COST network and the [data network] Internet;

(d) placing a second call associated with the first call on the network other than the network on which the first call is received; and

(e) dynamically converting data between the two associated calls, thereby providing a continuing and dynamic telephony connection, enabling live conversation between a user on a COST telephone connected to the COST network and a user on [a DNT] an IPNT terminal connected to the [DNT network] Internet.

11. (Amended) The method of claim 7 further comprising a step for receiving [a DNT] an IPNT call from a caller, and negotiating with the caller to ascertain a COST telephone number for placing a call to be associated with the incoming [DNT] IPNT call.

13. (Amended) A computerized telephony bridge unit, comprising:

a first port and associated circuitry for receiving and placing calls on a connection-oriented/switched telephony (COST) network [first network], including circuitry for generating data according to a protocol compatible with the [first] COST network;

a second port and associated circuitry for receiving and placing calls on [a second network] an Internet network in which internet Protocol Network Telephony (IPNT) calls may be processed, including circuitry for generating data according to a protocol compatible with the [second

network] Internet; and

conversion circuitry for converting data dynamically between the [first] COST network protocol and the [second network] Internet protocol;

wherein control routines functioning as part of the bridge unit receive a first call from either the [first] COST network or the [second] Internet [network], place a call associated with the received call on the network other than the network on which the call is received, and dynamically convert data between the associated calls, and the dynamic conversion of data enables two people to engage in a live conversation even though one person is on [a data network] the Internet and the other is on a COST network.

Respectfully,
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